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FAIR POLITICAL PRACTICES COMMISSION
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Attorney for Complainant

BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

STATE OF CALIFORNIA

In the Matter of) FPPC No. 09/537
)
)
CHICO DEMOCRATS 08, and MICHAEL) STIPULATION, DECISION and
WORLEY;) ORDER
)
)
Respondents.)
)
)

Complainant Roman G. Porter, Executive Director of the Fair Political Practices Commission, and Respondents Chico Democrats 08 and Michael Worley, hereby agree that this Stipulation will be submitted for consideration by the Fair Political Practices Commission at its next regularly scheduled meeting.

The parties agree to enter into this Stipulation to resolve all factual and legal issues raised in this matter and to reach a final disposition without the necessity of holding an administrative hearing to determine the liability of Respondents.

Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural rights set forth in Sections 83115.5, 11503 and 11523 of the Government Code, and in Section 18361.1 through 18361.9 of Title 2 of the California Code of Regulations. This includes, but is not limited to, the right to personally appear at any administrative hearing held in this matter, to be represented by an attorney at Respondents' own expense, to confront and cross-examine all witnesses testifying at the

1 hearing, to subpoena witnesses to testify at the hearing, to have an impartial administrative law judge
2 preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

3 Respondents Chico Democrats 08 and Michael Worley, stipulate and agree that they violated the
4 Political Reform Act by qualifying as a committee pursuant to Government Code Section 82013
5 subdivision (a), and thereafter, failing to file required campaign statements and reports, in violation of
6 Government Code Sections 84101, subdivision (a), 84200, subdivision (a), and 84204. (1 count); and by
7 sending a mass mailing which failed to display the required sender identification, in violation of
8 Government Code Section 84305, subdivision (a), (1 count), as described in Exhibit 1. Exhibit 1 is
9 attached hereto and incorporated by reference as though fully set forth herein. Exhibit 1 is a true and
10 accurate summary of the facts in this matter.

11 Respondents Chico Democrats 08 and Michael Worley, agree to the issuance of the Decision and
12 Order, which is attached hereto. Respondents Chico Democrats 08 and Michael Worley, also agree to
13 the Commission imposing upon it an administrative penalty in the amount of Four Thousand Dollars
14 (\$4,000).

15 A cashier's check from Respondents totaling Four Thousand Dollars (\$4,000), made payable to
16 the "General Fund of the State of California," is submitted with this Stipulation as full payment of the
17 administrative penalty, to be held by the State of California until the Commission issues its Decision and
18 Order regarding this matter. The parties agree that in the event the Commission refuses to accept this
19 Stipulation, it shall become null and void, and within fifteen (15) business days after the Commission
20 meeting at which the Stipulation is rejected, all payments tendered by Respondents in connection with
21 this Stipulation shall be reimbursed to Respondents. Respondents further stipulate and agree that in the
22 event the Commission rejects the Stipulation, and a full evidentiary hearing before the Commission
23 becomes necessary, neither any member of the Commission, nor the Executive Director, shall be
24 disqualified because of prior consideration of this Stipulation.

1 Dated: _____

Roman G. Porter, Executive Director
Fair Political Practices Commission

4 Dated: _____

Michael Worley, individually and on behalf of
Chico Democrats 08

7 **DECISION AND ORDER**

8 The foregoing Stipulation of the parties “In the Matter of Chico Democrats 08 and Michael
9 Worley, FPPC No. 09/537,” including all attached exhibits, is hereby accepted as the final Decision and
10 Order of the Fair Political Practices Commission, effective upon execution below by the Chairman.

12 IT IS SO ORDERED.

14 Dated: _____

Dan Schnur, Chairman
Fair Political Practices Commission